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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

BETTER MORNINGS, LLC and ISLAND  
BREEZE, LLC

Plaintiffs,

vs.

JOSEPH NILSEN and DIGITAL  
CHECKMATE, INC.

Defendants.

Case No.: 2:19-cv-03854

**NOTICE OF MOTION FOR  
DEFAULT JUDGMENT**

PLEASE TAKE NOTICE that upon the accompanying Declaration of Berwin Cohen, dated August 12, 2019, the exhibits attached thereto, and the accompanying Memorandum of Law In Support of Plaintiffs' Motion For Default Judgment, Plaintiffs Better Mornings, LLC and Island Breeze, LLC, by its attorneys Wolffers Cohen & Edderai LLP, will move this Court at such time as the Court may direct, at the United States Courthouse, 100 Federal Plaza, Courtroom 1030, Central Islip, NY 11722, for an order pursuant to Fed. R. Civ. P. 55(b)(2) and Local Rule 55.2 of the Local Rules of the United States District Court for the Eastern District of New York, granting Plaintiffs' motion for entry of a default judgment in the amount of \$900,135.85, plus statutory post-judgment interest, and for such other and further relief as this court deems just and proper. Oral argument shall be held on such date and at such time as may be designated by the court.

*[Signature Page Follows]*

1 DATED: August 12, 2019

/s/ Berwin Cohen

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17 193 Cherry St.  
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19 c/o Joseph Nilsen  
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